

**BEFORE**

**THE PUBLIC SERVICE COMMISSION OF**

**SOUTH CAROLINA**

**DOCKET NO. 2020-247-A**

IN RE:	)	
	)	
Public Service Commission Review of South	)	<b>REPLY COMMENTS OF THE</b>
Carolina Code of Regulations Chapter 103	)	<b>SOUTH CAROLINA CABLE</b>
Pursuant to S.C. Code Ann. Section 1-23-120(J)	)	<b>TELEVISION ASSOCIATION</b>
_____	)	

Pursuant to the Public Service Commission of South Carolina’s (“Commission”) April 27, 2021 Sixth Amended Notice of Workshops, the South Carolina Cable Television Association (“SCCTA”) hereby submits the following reply comments in this proceeding.

**REPLY COMMENTS**

As SCCTA proposed in its Initial Comments, the Office of Regulatory Staff (“ORS”) and the South Carolina Telephone Coalition (“SCTC”) also recommend that the Commission strike R. 103-690.C.(a)(5) and R. 103-690.1.B.(b)(8) because the Federal Communications Commission (“FCC”) no longer requires Eligible Telecommunications Carriers (“ETCs”) to provide equal access to long distance carriers. Likewise, SCCTA, SCTC and ORS all agree that the Commission should delete reference to Link Up in R. 103-690.B.5 *et seq.* because the FCC eliminated this service on non-Tribal lands for all ETCs. Eliminating these rules should clearly be part of the Commission’s modernization and revision of its telecommunications regulations.

Like SCCTA, SCTC proposed that the Commission delete R. 103-690.C.(a)(1)(B), as unnecessary. Going further, SCTC proposed that the Commission delete other ETC designation requirements from R. 103-690.C.(a)(2) through (7) and in lieu thereof inserted proposed language at R. 103-690.C.1 and requiring that the applicant provide “information and certifications set forth

in 47 C.F.R. §§ 54.201 and 54.202.” SCCTA concurs with these proposed revisions to R. 103-690 that bring state ETC regulations back in line with current FCC requirements.

SCTC proposed deletion of R. 103-690.1.B.(b)(10) given that reverification of Lifeline subscribers is now being performed by the National Verifier. SCTC also proposed striking all Lifeline service guidelines from R. 103-690.1.E.(a)(1) through (6) and suggested that the rule note that service is offered in accordance with guidelines “as set forth in 47 C.F.R. Part 54, Subpart E.” Deleting the proposed sections and including such a reference will ensure that the Commission’s Lifeline rules remain current with FCC requirements. These are all changes the Commission should make as part of this proceeding to update its telecommunications rules.

SCCTA appreciates the Commission’s consideration of its proposals and looks forward to discussing these and other matters raised at the May 21, 2021 workshop.

Respectfully submitted,

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